REMARKS

Applicants request favorable reconsideration and allowance of the subject application in view of the preceding amendments and the following remarks.

The claims now pending in the application are claims 1-13, with claims 1, 10, and 13 being independent. By this Amendment, claims 1, 4, 5, 10, and 13 have been amended. Support for the amendments can be found in the original application, as filed. No new matter has been added.

In the outstanding Office Action, claims 1, 4, 5, 10, and 13 were rejected under 35 U.S.C. § 102 as anticipated by U.S. Patent No. 6,466,331 to Tai et al. In addition, claims 2, 3, 7-9, 11, and 12 were rejected under 35 U.S.C. § 103 as unpatentable over Tai et al. in view of U.S. Patent No. 5,978,563 to Kawamoto. Applicants traverse these rejections.

As now recited in claim 1, according to one aspect of the present invention a novel image processing apparatus includes a plurality of rendering sections and a convertor. The rendering sections respectively generate color component images on the basis of data common to the respective color components. Each rendering section executes a rendering including a process that overwrites foreground data generated in accordance with the common data in destination data indicated by the common data so as to generate one of the color component images as a red, green, or blue color component image. The convertor converts the generated color component images into color component images for printing in synchronism with operation of a printer engine.

Independent claims 10 and 13 respectively relate to an image processing method and a computer program product storing a computer-readable medium comprising program code for an image processing method. These claims generally correspond to apparatus claim 1.

10

Thus, according to each of independent claims 1, 10, and 13, each of plural rendering sections executes a rendering including a process which overwrites foreground data generated in accordance with common data in destination data indicated by the common data so as to generate one of color component images as a red, green, or blue color component image. Such features are discussed in the specification, for example, from page 9, line 21 to page 10, line 14, and at page 11, lines 9-19. For example, by performing rendering in RGB color, rendering is efficiently executed by the present invention, because rendering is executed by overwriting foreground data.

Applicants submit that at least these features are not taught or suggested by Tai et al. or Kawamoto, whether those references are taken alone or in combination.

Tai et al. relates to a multi-bit rendering with single color and two-color capability. In Tai et al., processors 140 and 150, which the Examiner points to as corresponding to the recited rendering section of the present invention, are designed for tri-state images. However, nowhere does Tai et al. teach or suggest at least that the processors execute a rendering including a process which overwrites foreground data generated in accordance with common data in destination data indicated by the common data so as to generate one of color component images as a red, green, or blue color component image, as recited in claims 1, 10, and 13. Accordingly, reconsideration and withdrawal of the rejections of these claims under 35 U.S.C. § 102 are requested.

Kawamoto was cited merely for teaching features of dependent claims. Kawamoto is not understood to teach or suggest at least that each of plural rendering sections executes a rendering including a process which overwrites foreground data generated in accordance with common data in destination data indicated by the common data so as to generate one of color component images as a red, green, or blue color component image, as recited in claims 1, 10, and 13.

11

Accordingly, Applicants submit that <u>Tai et al.</u> and <u>Kawamoto</u>, whether taken alone or in combination, fail to teach or suggest the present invention, as recited in claims 1, 10, and 13.

The remaining claims depend from one of the independent claims and are believed allowable by virtue of that dependency, as well as for reciting other patentable features of the invention. Independent and favorable reconsideration of the dependent claims are respectfully requested.

Applicants request reconsideration and withdrawal of the outstanding rejections. Additionally, Applicants submit that this application is in condition for allowance. An early Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

Attorney for Applicants
Michael J. Didas
Registration No. 55,112

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200
MJD/ksp

DC_MAIN 173947v1

12